



State of Ohio Environmental Protection Agency

**Northwest District Office**

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Re: Ottawa County Landfill  
Inspection

March 28, 2007

Mr. Dave Vossmer  
Browning-Ferris Industries of Ohio, Inc.  
530 North Camp Road  
Port Clinton, Ohio 43452

Dear Mr. Vossmer:

On January 26 and March 15, 2007, I, representing the Ohio Environmental Protection Agency (Ohio EPA), conducted inspections of the Browning-Ferris Industries, Inc. of Ohio (BFIO) Ottawa County Landfill (facility). These inspections were conducted in accordance with Ohio Administrative Code (OAC) Rule 3745-37-08(C)(6). The purpose of the inspections was to verify compliance with OAC Chapter 3745-27 and the approved Permits to Install No. 03-3822 and 03-15784. Jim Kajawa represented the facility during both inspections. Following are my observations during the inspections:

January 26, 2007 Inspection:

The weather at the time of the inspection was cold and cloudy with a brisk south wind.

An odor survey was conducted by driving around the facility on North Camp Road, State Route 2, Tettau Road, and State Route 163. A very slight odor of solid waste was identified on Tettau Road northwest of the landfill.

The required daily logs for December 27, 2006 through January 25, 2007, were reviewed. The daily logs included the annual cover sheet (Form 1), records of the weights of waste received (Form 2), the daily facility inspection checklist (Form 3), and the required weekly surface water structure inspection documentation (Form 4). The daily inspection checklist form is also used to document the phase in which waste was disposed, the type of daily cover used (as required in some alternate daily cover approvals), the placement of intermediate cover, and the number of litter pickers on site. In addition, the logs documenting the placement of select waste in Cell 1D were reviewed. The PCB/hazardous waste prevention and detection program inspection logs were not reviewed during this inspection.

Mr. Dave Vossmer  
March 28, 2007  
Page Two

General waste placement activity is currently occurring in Cell 1C. Some flagging of waste was noted in the daily cover in Cell 1C. Ensure that the soil daily cover placed over the disposed waste is at least 6 inches in depth and is maintained so that the waste remains completely covered. An area of ponded water was observed on the south side of Cell 1C. Mr. Kajawa stated that the area would be regraded to eliminate the ponding. Asbestos containing materials are disposed in Cell 1A. The cover soils in Cell 1A appeared adequate. Alumitech foundry wastes continue to be disposed in the east mound of Phase 9. The soil daily and intermediate cover in Phase 9 appeared adequate.

Very little blown litter was noted in the areas of the facility observed. Two litter pickers were on duty at the time of the inspection. Additional litter fencing had been installed on the south side of the main haul road. Other litter fences and portable litter screens were in use. Ensure that the facility continues to employ all reasonable measures to collect, properly contain, and dispose of scattered litter.

The minor leachate outbreak on the west side of Cell 1A identified during the November 30, 2006 inspection will be repaired when soil conditions permit. Mr. Kajawa stated that he had placed some kitty litter over the leachate seep to help contain any further flow. It did not appear that a discharge to surface water control structures was likely due to this outbreak. The facility will continue to monitor this outbreak until it can be repaired.

The leachate outbreak on the east slope of Cell 1A identified during the December 27, 2006 inspection had been repaired.

An additional leachate outbreak was identified during the inspection in the northeast corner of the east mound of Phase 9. Some of the ice in the surface water ditch was stained with leachate. The downstream portion of the ditch was examined closely. All leachate from the seep appeared to have been frozen and no discharge to a sedimentation basin was noted. Mr. Kajawa instructed a landfill employee to immediately remove the stained ice and repair the outbreak during the inspection.

Mr. Kajawa stated that he had identified an additional leachate outbreak on the north side of Cell 1A approximately one week prior to the inspection. This outbreak was repaired the morning of the inspection.

Minor erosion was noted on the west side of the north unit. Mr. Kajawa stated that the erosion would be repaired when soil conditions permit.

March 15, 2007 Inspection:

The weather at the time of the inspection was cold and overcast with a brisk east wind. Portions of the facility were covered with snow.

Mr. Dave Vossmer  
March 28, 2007  
Page Three

An odor survey was conducted by driving around the facility on North Camp Road, State Route 2, Tettau Road, and State Route 163. A very slight odor of solid waste was identified on Tettau Road west of the landfill.

The required daily logs, as described in detail above, were reviewed for January 27 through March 14, 2007 and appeared to have been properly completed. In addition, records documenting placement of select waste in Cell 1D were reviewed.

General waste placement activity continues in Cell 1C. Although most of the daily cover in Cell 1C appeared adequate, an area on the south side of Cell 1C had not been covered. On the east side of the uncovered area, previous days' waste had been covered with soil. On the west side of the uncovered area, the tarp alternate daily cover (ADC) had been removed from the previous day's working face and waste was visible. The section between the soil cover and the exposed waste was snow covered - indicating that it was not covered with the ADC during the overnight hours when snow fell. Please see attached photo. **The owner/operator is in violation of OAC Rule 3745-27-19(F) which requires daily cover to be applied to all exposed solid waste by the end of the working day.** Ensure that all waste is covered by the end of each working day.

Two scrap tires were observed in previous days' disposed waste. One was located west of the snow covered area described above and was partially covered with soil. The second was located in the snow covered area described above. Both were removed during the inspection. **The owner/operator is in violation of OAC Rule 3745-27-19(E)(8)(g) which prohibits acceptance of scrap tires.** Ohio EPA suggests that the facility provide additional training to customers regarding the scrap tire prohibition.

Waste placement activities had progressed to the point where the area of ponded water on the south side of Cell 1C that was noted during the January 26, 2007 inspection had been filled with several feet of waste. No ponded water was noted in this area.

Asbestos containing materials continue to be disposed in Cell 1A. The cover soils in Cell 1A appeared adequate. Alumitech foundry wastes continue to be disposed in the east mound of Phase 9. The soil daily and intermediate cover in Phase 9 appeared adequate. Some areas of ponded water were noted in the east mound of Phase 9, north of the haul road. This area must be regraded to eliminate ponding of leachate.

Select waste placement in Cell 1D is complete. No exposed or flagging waste was observed in the daily cover in Cell 1D.

Very little blown litter was noted in the areas of the facility observed. One litter picker was on duty at the time of the inspection. Litter fences and portable litter screens were in use. Ensure that the facility continues to employ all reasonable measures to collect, properly contain, and dispose of scattered litter.

All leachate outbreaks discussed in previous inspection reports have been repaired. Mr. Kajawa had discovered and marked with flags two small leachate outbreaks on the north side of Cell 1A. An additional small leachate outbreak was identified on the west side of Cell 1A during the inspection. Mr. Kajawa stated that these leachate outbreaks would be repaired when conditions permit.

Several areas of erosion were noted: minor erosion on the east and west sides of the north unit, larger erosion rills on the south side of the north unit, and minor erosion on the east side of cell 1A. Each of the minor erosion rills was marked with a flag. Mr. Kajawa stated that he intends to begin repair of the erosion as soon as the slopes are dry enough to limit damage caused by the use of equipment to perform the repairs.

Additional stone is needed in the rock surface water letdown on the east end of the north side of the north unit.

Additional settlement has occurred in the northwest corner of the north unit, in the area currently under investigation due to the presence of a subsurface fire. The area is marked with a flag. Mr. Kajawa stated that additional soils would be brought in and the area regraded.

General Comments:

- Ohio EPA has observed or has been informed of eight leachate outbreaks during the four most recent facility inspection. The dates of the inspections and the locations of the outbreaks are summarized below:

Inspection date:	Location:	Discovered by:
November 30, 2006	West side of Cell 1A	Ohio EPA
November 30, 2006	North side of east mound of Phase 9, south of haul road	Ohio EPA
December 27, 2006	East side of Cell 1A	Ohio EPA
January 26, 2007	Northeast corner of east mound of Phase 9, near surface water ditch	Ohio EPA
January 26, 2007	North side of Cell 1A (discovered and repaired before inspection)	Facility
March 15, 2007	West side of Cell 1A (north of 1 <sup>st</sup> outbreak)	Ohio EPA
March 15, 2007	North side of Cell 1A - flagged for repair*	Facility
March 15, 2007	North side of Cell 1A - flagged for repair*	Facility

\*Two separate outbreaks in same general area.

Mr. Dave Vossmer  
March 28, 2007  
Page Five

Ohio EPA has discovered five of the eight outbreaks. OAC Rule 3745-27-19(E)(11) states in pertinent part:

*The owner or operator shall inspect the sanitary landfill facility at least daily for ponding, erosion, and leachate outbreaks. Written results of the inspections, including a discussion of any corrective actions taken, the date, and weather conditions, shall be recorded on the daily log forms required pursuant to paragraph (E)(10) . . .*

Ensure that the owner/operator's daily inspection of the facility is thorough enough to detect ponding, erosion, and leachate outbreaks.

- In summer 2005, as construction of the first cell in the south unit, Cell 1A, neared completion, you and I discussed your plan for transitioning waste placement activities from the north unit to the south unit. As at least 40 feet of waste is necessary for installation of a solidification pit, it was agreed that liquid waste solidification activities and some waste placement would continue in Phase 9 until the necessary depth of waste was achieved in the south unit. This is consistent with OAC Rule 3745-27-19(E)(7)(b), which states:

*The owner or operator shall not begin filling in a new phase, without completing the previous phase, except to the extent necessary for the proper operation of the sanitary landfill facility.*

In summer 2006, the solidification pit was removed from Phase 9. Placement of Alumitech waste continues in Phase 9 while all other waste streams are disposed in the south unit. Continued operations in Phase 9 are no longer necessary as the solidification pit has been removed. You have stated that you expect final grades to be reached and final cover to be placed in Phase 9 in summer 2007. Please ensure that Phase 9 is completed and final cover is initiated in accordance with OAC Rule 3745-27-19(H) and the approved facility permit.

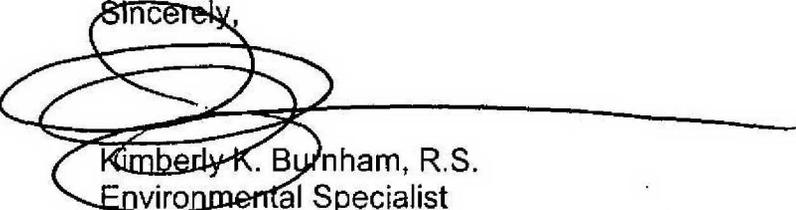
This correspondence addresses specific observations only for the areas of the Ottawa County Landfill that were inspected. Nothing present in, nor absent from this correspondence is intended to mean that no other violations existed at the facility at the time of inspection.

Compliance with the requirements outlined in this letter, or the solid and infectious waste provisions contained in the Ohio Revised Code Chapter 3734. and the rules promulgated thereunder, does not relieve the owner/operator of the Ottawa County Landfill from their obligations to comply with other applicable state and federal laws and regulations.

Mr. Dave Vossmer  
March 28, 2007  
Page Six

Should you have any questions, please contact me at (419) 373-3049.

Sincerely,



Kimberly K. Burnham, R.S.  
Environmental Specialist  
Division of Solid and Infectious Waste Management

/lb

Enclosure

pc: Elena Goodhall, Allied Waste  
Danielle Axson, Allied Waste  
Erie Township Trustees  
Tim Wasserman, Ottawa-Sandusky-Seneca SWMD  
Scott Young, Ottawa County Health Department (w/o enclosure)  
Steve Hathaway, (w/o enclosure)  
Kimberly Burnham, DSIWM NWDO (w/o enclosure)  
~~NWDO File: Ottawa County, BEI-Ottawa County landfill inspections~~

ec: Habib Kaake  
Carol Norman